

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH V. BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY,

Defendant.

:
:
:
:
:
:
:
:
:
:
:

CIVIL ACTION NO. 16-00248

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Ruth V. Briggs (“Plaintiff”) and Defendant Temple University – of the Commonwealth System of Higher Education (“Defendant”) (collectively, the “Parties”), by and through counsel, jointly move this Court for an extension of all deadlines established in the Court’s Scheduling Order of August 10, 2016 (Doc. No. 15). The Parties respectfully request that the following new deadlines be established, due to Plaintiff’s counsel’s trial schedule, a larger than expected volume of electronically stored information (“ESI”), and the impact of Defendant’s academic calendar on witness availability:

1. All factual discovery shall be completed on or before March 15, 2017;
2. All dispositive motions, if any, shall be filed on or before April 17, 2017; and
3. If the parties do not file any dispositive motions, the parties’ Joint Pretrial Order shall be filed on or before May 1, 2017. If dispositive motions are filed, the parties’ Joint Pretrial Order shall be filed within fourteen (14) days after the Court’s disposition of the dispositive motions.

The Parties seek the relief requested in this motion for the following reasons:

1. Plaintiff's counsel represents that they are scheduled to commence a two-week trial in the District Court for the District of New Jersey in the matter of *Braden v. Lockheed Martin Corporation* (Civil Action No. 14-4215) beginning on January 23, 2017.
2. Plaintiff's counsel represents that the January 23, 2017 trial date causes them to be largely unavailable during the month leading up to the current end-of-discovery deadline in this matter (February 15, 2017).
3. The Parties have exchanged initial discovery, and negotiated and agreed upon search terms for electronically stored information ("ESI"). Defendant has commenced a rolling production of documents in response to Plaintiff's discovery requests, and the production is ongoing.
4. Plaintiff's counsel has been informed that Defendant has searched for ESI on its shared network drives, in its email files, and on the hard drives and personal drives of seven custodians who may have information relevant to the claims and defenses in this matter.
5. Plaintiff's counsel has been informed that Defendant will continue to produce responsive, non-privileged documents to Plaintiff on a rolling basis.
6. Plaintiff and Defendant have been and are diligently pursuing fact discovery.
7. Plaintiff's counsel has asked to depose seven Temple employees, some of whom are professors and department chairs or high level administrative personnel. Such witnesses have had schedule restrictions, busy periods, and time out of the office, which have made them unavailable until the completion of Winter Break (January 17, 2017).
8. The delay will not unreasonably extend the trial or resolution of this case or otherwise affect the administration of justice.

9. Defendant's counsel authorized Plaintiff's counsel to submit this motion as an uncontested joint motion and to file this joint motion on behalf of the Parties.

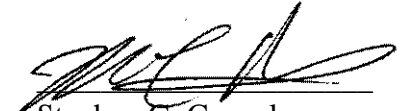
Therefore, Plaintiff and Defendant respectfully request that the Court grant this motion and extend the deadlines set forth in this Court's Order of August 10, 2016 to the new dates specified herein and to enter the proposed order.

Respectfully submitted,

CONSOLE LAW OFFICES LLC

Dated: January 10, 2017

By:


Stephen G. Console
Rahul Munshi
1525 Locust St., Ninth Floor
Philadelphia, PA 19130
215-545-7676
215-814-8920(fax)

Attorneys for Plaintiff,
Ruth V. Briggs

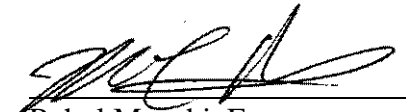
CERTIFICATE OF SERVICE

I, Rahul Munshi, hereby certify that the foregoing Joint Motion for Extension of Time was served this 10th day of January 2017, via electronic mail and the Court's electronic filing system, upon the following:

Francine Friedman Griesing, Esq.
Elizabeth Livingston, Esq.
Griesing Law LLC
1717 Arch St., Suite 3630
Philadelphia, PA 19103

Attorneys for Defendant

By:


Rahul Munshi, Esq.